

May 26, 2020

Via First Class U. S. Mail and Electronic Mail
Office of the Attorney General
Consumer Protection and Antitrust Bureau
33 Capitol Street
Concord, NH 03302
attorneygeneral@doj.nh.gov

Re: Data Breach – Nordic Village Resort, Jackson, NH

CCC File No. 4061.202

Dear Sir or Madam:

Cooper Cargill Chant, P.A. has been retained to represent Nordic Village Resort ("Nordic Village"). I am writing on behalf of Nordic Village to report a data security incident involving the potential unauthorized access of certain of its guests' personal information as described below. Nordic Village is a vacation resort business located in Jackson, New Hampshire which works with third-party service providers to secure reservations through an internet portal. Nordic Village is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident in the future.

## 1. Nature of Security Incident.

On March 2, 2020, Nordic Village was alerted by its service provider, TravelClick, that no more than two (2) current employees of Nordic Village were believed to be victims of an electronic mail phishing scheme which included a malicious link to a website impersonating the TravelClick iHotelier login portal. The unknown unauthorized party may have then used the employee(s) genuine credentials to access the legitimate reservation system. On March 10, 2020, Nordic Village was provided a list of twenty-six (26) reservations that were potentially affected relative to this incident. After working with its third-party service providers, and upon further internal investigation, it is Nordic Village's understanding that the initial breach occurred on or about February 14, 2020. Between February 14, 2020 and March 2, 2020, the unauthorized party could have accessed certain information collected during the reservation process for the twenty-six (26) potentially affected guests, including mailing address (if

provided), phone number (if provided), e-mail address and credit card number. However, the unauthorized party did not have access to the expiration date or CVV code associated with any individual credit card number.

## 2. Number of Residents Affected.

Two (2) of the twenty-six (26) potentially affected guest reservations listed, or are believed to have, a mailing address in New Hampshire. A notification letter was sent to each of those two (2) New Hampshire residents on May 26, 2020 via both First Class U. S. Mail and electronic mail to the mailing address and e-mail address on file with Nordic Village. Correspondence to the potentially affected New Hampshire residents was delayed by the effects of the Coronavirus, including undersigned counsel's inability to efficiently communicate with relevant parties and to gather the necessary information to generate required disclosure notices. A copy of the notification letter is enclosed for your review.

## 3. Steps Taken or Planned in Relation to the Incident.

Nordic Village continues working with its third-party providers and information technology vendors to enhance its internet and other secured platforms. Upon learning of this incident, Nordic Village educated its employees and provided additional relevant training on how to identify and avoid "phishing" schemes in the future. Additionally, the third-party service provider immediately deactivated existing log-in / access information and issued new log-in credentials for Nordic Village employees. Our Firm initiated a police report with local law enforcement authorities and continues to assist law enforcement in their efforts and investigation relative to this incident. If determined that the breach occurred by unauthorized parties located outside the United States, our Firm will initiate a report with the Federal Bureau of Investigation. As you will see in the enclosed letter, Nordic Village also offered all potentially affected guests a one-time reimbursement of up to Fifty Dollars (\$50.00) should any individual wish to pursue credit monitoring or any other credit or security freeze service. These reimbursements will be managed and administered through our law office.

## 4. Contact Information.

Nordic Village understands the importance of securing the guest data it maintains and regrets any concern and inconvenience that this incident may cause its customers. Please contact me at 603-356-5439 or by e-mail at <a href="mailto:tgrisez@coopercargillchant.com">tgrisez@coopercargillchant.com</a> if you have questions or should you require any additional information at this time.

Very truly yours,

COOPER CARGILL CHANT, P.A.

Theresa J. Grisez, Esquire E-MAIL: tgrisez@coopercargillchant.com

TJG/bta

Enclosure: Notification Letter NH Resident

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May 26, 2020

Via First Class U. S. Mail and Electronic Mail
«MrMs» «First\_Name» «Last\_Name»
«Address\_1»
«City», «State» «Zip»
«Email»

Re: Data Breach – Nordic Village Resort, Jackson, NH

CCC File No. 4061.202

Dear «MrMs» «Last Name»:

I am writing on behalf of our client, Nordic Village Resort in Jackson, New Hampshire. Nordic Village Resort values its guest relationships and recognizes the importance of securing all guest information it maintains. As such, the purpose of this letter is to inform you that Nordic Village Resort has recently identified and addressed a security incident involving a third-party service provider used to manage electronic reservations which may have resulted in the unauthorized access of certain information you may have provided during your reservation process; specifically, guest name, contact information including e-mail address, phone number and mailing address, if provided, and credit card number (in your case card ending in #«Last\_4»), but not the credit card expiration date and CVV code. The third-party service provider recently informed Nordic Village Resort that an unknown unauthorized party may have gained access to the above guest reservation data between February 14, 2020 and March 2, 2020. Our Firm has initiated a police report with local law enforcement authorities and continues to assist law enforcement in their efforts and investigation relative to this incident. We have also notified the New Hampshire Office of the Attorney General, Consumer Protection and Antitrust Bureau.

At this time, Nordic Village Resort has no evidence that your information has been misused. It is always advisable, however, to carefully review your credit card statements for any unauthorized activity and to immediately report any unknown or unauthorized charges to your card issuer -- as cardholders are generally not responsible for unauthorized charges reported in a timely manner. Please note that, under U.S. law, you are entitled to receive one free credit report annually from each of the three national consumer reporting agencies. To obtain your complimentary credit report, visit <a href="http://www.annualcreditreport.com">http://www.annualcreditreport.com</a> or call 1-877-322-8228. We urge you to remain vigilant by reviewing your account statements and monitoring your credit reports on an annual basis.

In some states, you have the right to place a security freeze on your credit file, which will prevent new credit from being opened in your name without the use of a special PIN number that is issued to you when you initiate the freeze. A security freeze will also prevent potential creditors from accessing your credit report without your consent. As a result, initiating a security freeze may interfere with, or delay, your ability to legitimately obtain credit. If you choose to do so, you must place a separate security freeze on your credit file with each of the three (3) credit reporting agencies. You may be charged a fee of up to Five Dollars (\$5.00) to place, lift or remove a security freeze. In order to initiate a security freeze, you may be required to provide the consumer reporting agency with your personal information including your full name, Social Security number, date of birth, current and previous addresses, and a copy of your state-issued identification card, recent utility bill, and bank or insurance statements. Additional information can be found at www.experian.com or www.transunion.com or www.equifax.com.

Nordic Village Resort regrets any concern this incident may cause you. To that end, Nordic Village Resort will provide a one-time reimbursement of up to Fifty Dollars (\$50.00) should you elect to pursue credit monitoring or any other credit or security freeze service. To receive your reimbursement, you must incur the credit monitoring or related expense within sixty (60) days from the date of this letter, and submit a copy of your invoice and payment receipt to my attention, either by mail to 2935 White Mountain Highway, North Conway, New Hampshire (03860) or by e-mail to tgrisez@coopercargillchant.com.

Please do not hesitate to contact me to obtain a copy of the police report, if you have any questions, or if you would like to discuss this matter further.

Very truly yours,

COOPER CARGILL CHANT, P.A.

Theresa J. Grisez, Esquire

E-MAIL: tgrisez@coopercargillchant.com

TJG/bta

Copy to: NH Attorney General's Office, Consumer Protection and Antitrust Bureau YOLJENT FILENGOLD Nordic Village/6041 202 - Data Breach/Notification Letter NH Resident 2020 05 260 docx

